

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

RALPH LAUREN CORPORATION, PRL  
USA HOLDINGS, INC., and POLO/LAUREN  
COMPANY, L.P.,

Plaintiffs,

- against -

UNITED STATES POLO ASSOCIATION,  
INC., USPA PROPERTIES, INC., and  
ARVIND LTD. formerly named ARVIND  
MILLS LIMITED,

Defendants

Civil Action No. 13 CV 7147 (TPG) (AJP)

**ARVIND LIMITED'S NOTICE OF MOTION TO DISMISS OR STAY  
THE AMENDED COMPLAINT**

**PLEASE TAKE NOTICE** that Defendant Arvind Limited hereby moves this court, (1) pursuant to 9 U.S.C. § 3, to dismiss or stay Plaintiffs' Amended Complaint pending arbitration of the parties' disputes; or, alternatively, (2) pursuant to Federal Rule of Civil Procedure 12(b)(6), to dismiss Counts VI and VII of Plaintiffs' Amended Complaint alleging fraud for failure to state a claim upon which relief can be granted; and (3) pursuant to Federal Rule of Civil Procedure 12(b)(1), to dismiss Plaintiff Ralph Lauren Corporation's Amended Complaint for lack of subject matter jurisdiction (standing)

**PLEASE TAKE FURTHER NOTICE** that in support of its motion, Arvind Limited shall rely upon the accompanying Memorandum of Law, the Declaration of Lisa M. Mottes and exhibits thereto, and the confidential exhibits attached to the Declaration of W. David Cummings submitted in support of co-defendants United States Polo Association, Inc.'s and USPA

Properties, Inc.'s January 16, 2014 motion to dismiss or stay the amended complaint, namely, the Settlement Agreement and the License Agreement.

Dated: January 16, 2014

Respectfully submitted

By: 

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*Attorneys for Defendant Arvind Ltd.*

**CERTIFICATE OF SERVICE**

I hereby certify on this 16th day of January, 2014, a true and correct copy of the foregoing ARVIND LIMITED'S NOTICE OF MOTION TO DISMISS OR STAY THE AMENDED COMPLAINT; ARVIND LIMITED'S MEMORANDUM OF LAW IN SUPPORT OF ITS MOTION (1) TO DISMISS THE AMENDED COMPLAINT OR STAY PROCEEDINGS PENDING ARBITRATION; OR, ALTERNATIVELY, (2) TO DISMISS PLAINTIFFS' FRAUD COUNTS; AND (3) TO DISMISS PLAINTIFF RALPH LAUREN CORPORATION'S AMENDED COMPLAINT FOR LACK OF STANDING; DECLARATION OF LISA M. MOTTES IN SUPPORT OF ARVIND LIMITED'S MOTION TO DISMISS OR STAY THE AMENDED COMPLAINT and exhibits thereto were caused to be served by hand upon counsel of record for the plaintiff in the above titled and numbered case as follows:

John Morgan Callagy (By hand and via email)  
Andrea Lynne Calvaruso (via email)  
Jessica Lynn Klarfeld (via email)  
Melissa Errine Byroade (via email)  
William R. Golden, Jr. (via email)  
Kelley Drye & Warren L.L.P.  
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*Attorneys for Plaintiffs*  
*Ralph Lauren Corporation, PRL*  
*USA Holdings, Inc., and Polo/Lauren*  
*Company, L.P.*

and with consent, by email upon counsel of record for co-defendants United States Polo Association, Inc. and USPA Properties, Inc., namely,

Kyle C. Bisceglie  
Matteo J. Rosselli  
Olshan Frome Wolosky LLP  
Park Avenue Tower  
65 East 55th Street  
New York, New York 10022  
212-451-2300  
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Lisa M. Mottes